

1 ADAM PAUL LAXALT

Attorney General

2 ERIN L. ALBRIGHT, Bar No. 9953

Deputy Attorney General

3 State of Nevada

Bureau of Litigation

4 Public Safety Division

100 N. Carson St.

5 Carson City, NV 89701-4717

Tel: 775-684-1257

6 E-Mail: ealbright@ag.nv.gov

7 *Attorneys for Defendants Renee Baker,*

Arthur Boynton, Corey Cooke, James Cox,

8 *Michael Crossman, Marina Crounk, Seth Davis,*

Scott Evers, Charles Fillman, Michael Fletcher,

9 *Tyler Hathaway, Leslie Healer, Danny Holland,*

Bert Jackson, Michael Koehn, Steven Kimbrell,

10 *Brent LaBeau, Thomas Lamb, E.K. McDaniels,*

Javier Ornelas, Jeanette Ornelas, Taylor Paryga,

11 *Glenn Perkins, Christopher Roberts, Christian Rowley,*

Duane Thompson, Tom Tolbert, and Sommer Westbay

12
13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 KEVIN FERNANDEZ,

16 Plaintiff,

17 v.

18 JAMES GREG COX, et al.,

19 Defendants.

Case No.: 3:14-cv-00578-MMD-VPC

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
STIPULATION AND ORDER OF
DISMISSAL WITH PREJUDICE
(SECOND REQUEST)**

20 Defendants, Renee Baker, Arthur Boynton, Corey Cooke, James Cox, Michael Crossman,
21 Marina Crounk, Seth Davis, Scott Evers, Charles Fillman, Michael Fletcher, Tyler Hathaway, Leslie
22 Healer, Danny Holland, Bert Jackson, Michael Koehn, Steven Kimbrell, Brent LaBeau, Thomas Lamb,
23 E.K. McDaniel, Javier Ornelas, Jeanette Ornelas, Taylor Paryga, Glenn Perkins, Christopher Roberts,
24 Christian Rowley, Duane Thompson, Tom Tolbert, and Sommer Westbay, ("NDOC Defendants"), by
25 and through its counsel of record, Adam Paul Laxalt, Attorney General of the State of Nevada, and Erin
26 L. Albright, Deputy Attorney General, and Plaintiff, Kevin Fernandez, by and through his counsel of
27 record, Joseph Reiff, Esq., hereby stipulate to extend the time to file the Stipulation and Order of
28 Dismissal with Prejudice by four (4) weeks.

On September 18, 2018, defense counsel provided plaintiff's counsel with the revised settlement agreement that reflected the majority of the changes requested by Plaintiff. On the same date, plaintiff's counsel provided the settlement agreement to the New Hampshire prison for delivery to Plaintiff.

To date, the New Hampshire prison has failed to provide the revised settlement agreement to Plaintiff for his review and signature. The extra time requested because the prison in New Hampshire is to allow time for Plaintiff to review the revised settlement documents in New Hampshire and return them to his counsel in Nevada who will then forward the documents to the undersigned.

Based on the foregoing, the parties respectfully request this Court extend the time to file the Stipulation and Order of Dismissal with Prejudice by four (4) weeks.


DATED this 27th day of September, 2018.

PLAINTIFF, KEVIN FERNANDEZ

By: /s/ Joseph Reiff
Joseph Reiff, Esq.
Representing, Plaintiff, Kevin Fernandez

DATED this 27th day of September, 2018.

OFFICE OF THE ATTORNEY GENERAL

By: 
Erin L. Albright, SBN 9953
100 N. Carson Street
Carson City, NV 89701
(775) 684-1257
ealbright@ag.nv.gov
Attorneys for Defendants

IT IS SO ORDERED


United States Magistrate Judge

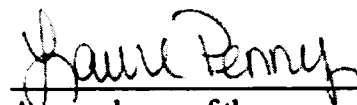
DATED 9/28/2018

CERTIFICATE OF SERVICE

I certify I am an employee of the Office of the Attorney General, State of Nevada, and that on this 27th day of September, 2018, I caused to be deposited for mailing a copy of the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE (SECOND REQUEST)**, addressed as follows:

Kevin Fernandez #110185
New Hampshire State Prison
P.O. Box 14
Concord, NH 03302

Joseph P. Reiff
Attorney at Law
3001 E. Charleston, Suite A
Las Vegas, NV 89104
jrlvlaw@yahoo.com



An employee of the
Office of the Attorney General